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# INVEST NI, F-35S AND ISRAEL: PUBLIC MONEY FOR WAR CRIMES?

Image: Lockheed Martin F-35C Lightning II Pulling G's by Asa Schlobohm - Getty Images



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## Introduction

Act Now is a people-powered digital campaigning organisation for Northern Ireland with over 28,000 members. We provide everyday people with the opportunities and tools to make change on issues they care about most - from climate change to protecting their local parks and post offices.

We do this to improve life for people across NI, to build a new story of Northern Ireland as a place where change is possible, and to counter despair and division that extremism can feed off.

Since Israel's assault on Gaza began, Act Now's members have been active in campaigning for a ceasefire in Gaza, a UK-wide arms embargo to Israel, and against Israel's participation in Eurovision. Our members responded in their thousands. In July 2024 Act now began investigating possible links between NI-based arms companies, Israel and Northern Ireland's regional economic development agency Invest NI.

Specifically, Act Now used Freedom of Information requests to carry out research over an 11 month period to uncover whether public money from people across Northern Ireland and beyond is being used by the Department for the Economy and Invest NI to support the construction and supply of F-35 jets to Israel, which are being used to bomb Gaza.

Finally and most importantly, 78 Act Now members chipped in money to support the creation of this report. We would like to thank the following people for supporting this important piece of work: Marjella, Brian, Pat, Una, Marian, CW, Margaret, Patrick, Hamish, L, David, Anne, Clare, Rosie, Robert, Michael, Grainne, Juliet, E, Gareth, Erin, Kathleen, Adele, Bridgeen, David, Michelle, Ian, Charlie, Nicola, Noeleen, Malachy, Patrick, Laura, Astrid, Charles, Mary, Kathleen, Nigel, Patricia, Ralph, Tessa, Jane, Phillip, Robert, Frances, Gerard, Seamus, Moze, Rhonda, Neil, Juha-Matti, Mary, Suniva, Paul, Vicki, Kathleen Nicholas, Richard, Antaine, Glanville, Peter, Lark, Peter Margaret, Laurence, Clive, Conall, John, Fionna, James, Veronica, Sile, Rosalind, Caoimhe, M and Rebecca.

## **Glossary of Terms**

**F-35 Lightning II programme:** F-35s are armed fighter jets and considered one of the most lethal, survivable and connected fighter aircraft produced in the world today. <u>American arms company Lockheed Martin</u> is the prime contractor of F-35s with principal partners <u>Northrop Grumman</u> and <u>BAE Systems.</u> F-35s are assembled at <u>Lockheed Martin's mile-long factory</u> at Air Force Plant 4 in Fort Worth, Texas. The UK is one of seven other <u>"partner" nations</u> - United States, Italy, Norway, Canada, Denmark, Australia and the Netherlands - and relies on these countries to produce and supply components.

**Freedom of Information Request (FOI)**: Under the Freedom of Information (FOI) Act, anyone can request (and, subject to certain exemptions, receive) information held by a public authority.

**Invest NI:** <u>Invest Northern Ireland (Invest NI)</u> is Northern Ireland's regional economic development agency and a non-departmental public body (NDPB) of the Department for the Economy (DfE). Invest NI was established on 1 April 2002 under the Industrial Development Act (Northern Ireland) 2002, which operates under a Board which is the body corporate.

According to Invest NI's <u>partnership agreement</u> with the Department for the Economy, Invest NI's core functions include:

- Selective Financial Assistance: providing financial assistance to create, maintain or safeguard employment in NI;
- General Powers of Industrial Development: establishing, promoting or assisting any industrial undertaking to develop the economy or promote industrial efficiency;
- Assistance for Research and Development and Marketing: providing financial assistance for industry to undertake Research and Development, to market their products and to promote the application, in industry, of the results of scientific research;
- Provision of Premises and Sites: the acquisition, development, or disposal of land for use by industry; and
- Supplementary Powers: incurring expenditure to exercise, promote or facilitate industrial development that is likely to provide employment in NI. Invest NI may also provide financial assistance towards any inquiries, investigations or research that will advance the core functions outlined above.

The Minister for the Economy is answerable to the NI Assembly for the overall performance and delivery of both the Department for the Economy and Invest NI.

## **Executive summary**

Invest NI used nearly £20 million of public money to fund four NI-based companies who produce components for the F-35 programme. Every F-35 is made by a number of different companies - U.S.-owned Lockheed Martin is the prime F-35 contractor with principal partners Northrop Grumman and BAE Systems. Israel became the first country to select the F-35 through the United States government's Foreign Military Sales (FMS) process when a Letter of Agreement was signed in October 2010. F-35s are assembled and distributed from Lockheed Martin's mile-long assembly line Air Force Plant 4 in Fort Worth, Texas. The UK supplies 15% of the value of every F-35 jet, mainly through BAE Systems.

F-35s are being used by Israel to bomb and massacre Palestinians in Gaza. In September 2024, NGO Danwatch, <u>revealed</u> that, for the first time, it has been possible to definitively confirm the use by Israel of an F-35 stealth fighter to carry out a specific attack in Gaza. Israel has one of the world's biggest fleet of F-35s in the world. In March 2025, The Jerusalem Post reported that the IDF increased its F35 fleet by 3 while moving toward a fleet of 75 by 2027, alongside other key upgrades.

We believe that four NI-based companies are being subcontracted by BAE systems to make different parts for the plane. The companies are:

- **RLC(UK)** (Newtownabbey and Crumlin) who produce fuselage and titanium blade components.
- Moyola Precision Engineering (Castledawson) who make airframe parts;
- Survitec (Dunmurry) who produce flight equipment for F-35 pilots.
- Electronic Automation Engineers (EAE) in Belfast have worked on F-35-related contracts and offer a specialised service, providing bespoke or predefined Automation system design and integration of Machinery / Manufacturing Systems.

Invest NI have distanced themselves and the funding provided to the four companies from the F-35 programme. In December 2024, <u>Invest NI said</u> that "we have not offered support towards any projects that supply arms to Israel. To make clear, we offer support to companies for specific projects and not for ongoing routine business costs." Furthermore, Invest NI "assured" the Department for the Economy and the Economy Minister that it "does not support projects that supply arms to Israel".

However, our Freedom of Information requests to Invest NI reveal the following:

- Invest NI has a significant relationship with BAE systems and the company's role in the F-35 programme and contracts.
- Invest NI worked closely with RLC(UK) and knew of the company's involvement in a BAE systems F-35 contract.
- Invest NI knew that Moyola Precision Engineering was involved in US defense related contracts which is most likely due to its production of F-35 components.
- Invest NI has a significant relationship with Survitec. Invest NI have also conducted specialised meetings with them such as on the topic of "R&D" and "growth" of business. Invest NI met at the site to discuss Research & Development projects and met as recently as January 2025.
- Invest NI knew that Electronic Automation Engineers (EAE) worked on F-35-related projects for Lockheed Martin and BAE Systems before becoming Invest NI's client. It, therefore, raises serious questions whether Invest NI conducted any due diligence and contacted the company to assess whether they continue to provide services for F-35 projects once Israel's bombing campaign commenced.

## **Key findings:**

#### **BAE Systems:**

- BAE Systems regularly contracts out work to smaller companies in the UK. The information received shows that Invest NI was involved in conversations with BAE Systems about F-35 contracts and sought a deeper working relationship with them.
- Such a relationship would make sense for **Invest NI** as they **would want local companies in NI to win contracts and get on BAE systems suppliers list.**

#### RLC(UK), (Crumlin/Newtownabbey)

• Invest NI knew of RLC's involvement in a BAE systems' F-35 contract, and provided them key and substantial administrative and strategic

#### support to win contracts such as F-35s.

• Invest NI has provided financial assistance to RLC, in addition to substantial strategic and administrative support to win contracts. In so doing, Invest NI had significant access to RLC's present and future plans.

#### Moyola Precision Engineering (Castledawson)

- Our findings reveal that Moyola Precision Engineering has the factory capabilities and labour specialisations for key processes in F-35 production and supply chains.
- Moyola Precision Engineering is an International Traffic in Arms Regulations (ITAR) compliant facility - which means any weapon or component produced in an ITAR factory cannot be built, supplied or sold to anyone, or even operated, without US consent and support. As such, there is a strong possibility that the company might be exporting military goods to the United States. Their relationship with a US federally-funded research and technology development agency that works for the U.S. Department of Defense supports this possibility.
- What is certain is that whatever Moyola produces and exports within its factory, it can only do so with the consent of the U.S. government. Therefore, as F-35s are subject to ITAR and Moyola produces airframe parts for F-35s, it can be inferred that there is a strong likelihood that the F-35 components produced by Moyola have been distributed to the US where the jets have been built and then supplied to Israel.
- Invest NI has provided financial assistance to Moyola Precision Engineering, as well as key administrative and strategic support, meeting as recently as January 2025. In doing so, Invest NI had significant access to Moyola's current and future plans.

#### Survitec (Dunmurry)

• Invest NI have also conducted specialised meetings such as on the topic of "R&D" and "growth" of business. Invest NI met at the site to discuss R&D projects and met as recently as January 2025.

#### **Electronic Automation Engineers (EAE) (Belfast)**

- Given that Invest NI knew NI-based Electronic Automation Engineering (EAE) had worked on F-35 projects for the aforementioned companies, did Invest NI conduct due diligence and contact the company to assess whether they continue to provide services for F-35 projects once Israel's bombing campaign commenced?
- As such, there is a strong possibility that taxpayer's money has provided specialised support for Israel's F-35 war planes.

# Act Now's Campaign Timeline on Invest NI, F-35s and Israel

#### July - November 2024 | Initial research and petition

In July and August 2024, Act Now submitted a series of Freedom of Information requests to Invest NI with regards to public money offered to various NI-based arms companies that have been linked to supplying arms and components to Israel. After receiving important information on three local companies who manufacture parts for F-35 fighter jets - which Israel has been using in its genocidal attacks on Gaza - we <u>launched our campaign</u> calling on the Economy Minister to come clean on whether public money is going to NI-based arms companies that are supplying arms to Israel.

#### December 2024 | First Belfast Telegraph article

Through these Freedom of Information requests and <u>reporting from Garrett</u> <u>Hargan</u> at the Belfast Telegraph, Act Now uncovered that Invest NI, which is a non-Departmental Body of the Department of the Economy, has given £19.66 million to three companies -

- 1. Survitec
- 2. Moyola Precision Engineering
- 3. RLC Engineering Group Ltd

All have operations in Northern Ireland that manufacture components for F-35 combat aircrafts.

In December 2024, a Department for the Economy spokesperson said it has been *"assured"* that Invest NI *"does not support projects that supply arms to Israel"*.

#### The spokesperson continued:

"Invest NI Letters of offer state that the Financial Assistance made available under the letter must not be used in, or paid to, any business or organisation which is illegal, or which Invest NI in its absolute discretion considers may bring disrepute to Invest NI or to the specific scheme under which the Financial Assistance is made available."

However, when challenged by Act Now and Garrett Hargan at the Belfast Telegraph, neither the department, the companies or Invest NI could directly refute the claims set out in the petition or article. Invest NI has stated that "a company's supply chain and customer base is the decision of the company" and it "has not offered support towards any investment projects that supply arms to Israel."

#### <u>February-June 2025 | New discoveries about Invest NI's decision making,</u> <u>petition delivery and The Detail revelations</u>

In February 2025, <u>Act Now worked with Irish Independent's Ellen Coyne</u> to question whether, if Invest NI had asked each of the companies for a guarantee, it would be possible for them to say definitively if public money had, or had not, gone towards the development or production of component parts that were used by Israeli war planes.

Martin Butcher, Oxfam's policy adviser for arms, conflict and international humanitarian law told the *Irish Independent* that "at least some" public funding "will be assisting in the maintenance and repair of F-35s". He argued that while the fighter jets are used by quite a few countries, "it would be fair to say that the Northern Irish public funding is, through this fund, supporting the Israeli air force."

Despite these new revelations, the Department for the Economy reiterated the same stance as it did in December 2024: a spokesman said "the department has been assured that Invest NI does not support projects that supply arms to Israel."

A week after the story broke, Act Now alongside Palestine solidarity campaign groups delivered our petition demanding that Economy Minister Caoimhe Archibald come clean on the funding. That same week, Act Now members sent over 600 emails to MLAs demanding that they put pressure on the Minister.

As a result of Act Now's campaign, several MLAs have asked questions to the Economy Minister in the NI Assembly on this issue. On Monday 10th Feb, during the minister's question time, Sinn Féin MLA Pat Sheehan asked (see the official report <u>here</u>):

Can the Minister provide an assurance that Invest NI does not support projects that help to arm Israel? To which she answered:

"First of all, it is important to say that no Government should arm Israel. Invest NI has assured me that it does not support projects that arm Israel, and no evidence has been presented to the contrary. However, I have asked Invest NI to review its investments to make absolutely sure that that is the case. It is important that I, as Economy Minister, and the general public are reassured on that matter."

In the same debate, SDLP MLA Sinead McLaughlin asked a follow-up topical question:

"Ms McLaughlin asked the Minister for the Economy, referring to a listed question and given that, as she is aware, it has been widely reported that Invest NI supports a number of companies involved in the manufacture of parts for F-35 fighter jets used by Israel in the bombing campaigns that have razed Gaza to the ground, for clarity on whether she stands by the comments of her predecessor, Conor Murphy, who stated that that was not taking place."

To which Minister Archibald answered:

"I thank the Member for her question. She is right: I have already addressed that issue. Invest NI has assured me that it does not provide support for projects that arm Israel, and no evidence has been provided to the contrary. As I indicated to Pat Sheehan, I have asked Invest NI to review its investments to make absolutely sure that that is the case. It is important that we have that reassurance."

To date, it remains unclear what this review will entail. Gerry Carroll MLA submitted a priority question to ask the Minister to provide more detail on the planned review of Invest NI's investments, including (i) the scope of the review and (ii) a timeline for completion. He has also submitted a question to ask the Minister why the review of Invest NI's investments is being done in-house, rather than by an independent body.

In response to the latter question, Caoimhe Archibald has confirmed that Invest NI will carry out an internal review of investments in what she called a <u>"robust and</u> <u>diligent manner"</u> - without defining what process it would take. During question time on February 17th, Finance Minister John O'Dowd said he has <u>"seen no</u> <u>evidence to support"</u> the claim that Invest NI is funding Israeli war planes and stated that "the Minister for the Economy has reiterated Invest NI's position on that, and indeed asked Invest NI to go back and double check."

On the 18th March 2025 Israel broke a two month ceasefire. Over 500 Act Now members responded by sending Economy Minister Caoimhe Archibald an email asking if their taxes are funding the Israeli military.

On April 4th 2024, Minister Archibald said the review <u>will be completed within 6</u> <u>months.</u>

In June 2025, reporting from Luke Butterly at The Detail cast doubt on the above statements from Minister Archibald and O'Dowd. Internal departmental correspondence reveals a caveat which was not shared with the press and public: Invest NI defined "arms" only as finished weapons or munitions - this definition excludes components made for F-35s. Butterly's report states how "one official questioned how the Department [for the Economy] could outright deny Invest NI

supports projects that supply arms to Israel, while at the same time saying 'Invest NI does not hold the information as to whether these companies provide parts for F35s.'"

In response to these revelations, Act Now's campaigner, Roan Ellis-O'Neill questioned the Minister's previous statements: *"I don't think the Minister's* statements have substance. What you're telling me answers a part of the puzzle. How could they just categorically come to that statement? Because they haven't given us evidence to say that. We are just supposed to take them on their word."

In Butterly's report, Martin Butcher from Oxfam went even further in his assessment of Invest NI's funding, stating that it is "absolutely" the case that parts produced in the UK - including Northern Ireland - would end up in Israeli jets:

"Therefore, Mr Butcher said, it is a certainty that components produced in the UK are going to Israel "either in new aircraft from the United States or as parts from a regional warehouse.

This would be the same for parts of components made in Northern Ireland, "because those parts will go for assembly within BAE factories and then on to the global supply system."

#### May 2025 | Fourth company discovered

In May 2025, Act Now worked again with reporter Garrett Hargan at the Belfast Telegraph t after discovering <u>Invest NI had given £157,365 in public funds to a</u> <u>fourth company, Belfast-based Electronic Automation Engineers (EAE)</u>, with links to a programme for building F-35 fighter jets. In response, the Department for the Economy (DfE) said: "Work on the review of Invest NI investments is ongoing and the findings will be made known in due course." EAE were contacted for comment.

# What else do we know about F-35s and Israel?

In September 2024, NGO Danwatch, <u>revealed</u> that, for the first time, it has been possible to definitively confirm the use by Israel of an F-35 stealth fighter to carry out a specific attack in Gaza.

Israel has one of the world's biggest fleet of F-35s in the world. In 2010, Israel became the first country to select the F-35 through <u>the United States</u> <u>government's Foreign Military Sales (FMS) process</u> when a Letter of Agreement was signed. In March 2025, Israel confirmed that its F-35 stealth fighters have flown airstrikes using <u>external ordnance</u> and that it has flown its F-35s for more than 15,000 operational flight hours since October 2023, taking part in *"thousands of sorties in all theaters."* In the same month, <u>The Jerusalem Post reported</u> that the IDF increased its F35 fleet by 3 while moving toward a fleet of 75 by 2027, alongside other key upgrades.

The UK supplies 15% of the value of the F-35 jet, <u>"including ejector seats, rear</u> fuselage, active interceptor systems, targeting lasers and weapon release cables, mainly through BAE Systems" and is the second largest supplier of spare parts in the world. In December 2024, <u>The Ditch and Declassfied UK revealed</u> that over 500 shipments of F-35 parts sent from an RAF airbase in Norfolk to the US, where they can be exported to Israel amid the Gaza genocide. Not only that, the Britain's Ministry of Defence confirmed within the report that the global pool of F-35 spares is owned by the Pentagon. Declassified UK <u>previously revealed</u> that from October 2023 to August 2024, F-35 components were delivered from an RAF base to Israel 14 times.

In May 2025, <u>analysis and evidence</u> released by the Palestinian Youth Movement suggests that direct shipments of F-35 components from the UK to Israel have been ongoing as of March 2025. This is in contradiction with Foreign Secretary David Lammy and other UK government ministers' repeated claims that direct shipments have ended since it introduced the partial arms export suspension in September 2024. According to new export licensing figures published by the UK government in May 2025, the UK approved licenses for <u>£127.6 million worth of</u> <u>military equipment to Israel</u> in single issue licenses between October to December 2024.

Act Now's campaign coincides with Palestinian human rights organisations Al-Haq and the Global Legal Action Network's (GLAN) legal action against the UK Government's decision to <u>"carve out" licences for F-35 components</u> when Foreign Secretary David Lammy suspended some arms export licences to Israel. Recently, lawyers for the NGOs argued that the British government has concluded that parts for the jets <u>must be supplied in all circumstances</u> - even though the government accepted that the UK-made components for F-35 jets "*might be used*" by Israel to commit war crimes in a previous legal submission.

After a four-day hearing in May 2025, the case exposed <u>structural flaws</u> in accountability in the UK's arms export regime. It revealed that the UK government's claim that it is for the courts, not parliament, to assess genocide, was contradicted in court proceedings as the government revealed that it has assessed there is '*no serious risk of genocide*' occurring in Gaza. Furthermore, the UK government described the global standard for assessment of International Humanitarian Law breaches as "*touchy feely*" and claimed not to have seen women and children deliberately targeted in Gaza, despite evidence presented in Court, and withheld a report specifically on the sniping of children. There were further questions on the government's methodology of what constitutes a breach of International Humanitarian Law after finding only '*one possible*' breach in Gaza.

# Public Money, Invest NI and Israel -Disclosures under FOI Legislation

The following section lays out in detail information obtained by Act Now between July 2024 and March 2025 from Invest NI and the Department for the Economy on three Northern Ireland based companies manufacturing F-35 components, and show how public money was used to support them through the provision of grants and guidance from Invest NI. It also considers the role of BAE Systems who are the principal partner of the F-35 programme, the company in which the UK government mainly supplies F-35 components through and sub-contracts work to companies across the UK.

Much of the information received through the Freedom of Information Act was redacted. The below analysis is based on the information that was made available to us.

## Principal UK Partner - BAE Systems

#### **Background of the company**

BAE systems is a principal partner of Lockheed Martin's F-35 Lightning II. <u>On its</u> <u>website</u>, the company states that it "*brings its military aircraft expertise to the development, manufacture, integration and sustainment of the F-35.*" It provides "13-15% workshare of each aircraft" and plays a "major role in the programme across multiple markets."

<u>According to the Guardian</u>, the UK "supplies 15% of the value of the F-35 jet, including ejector seats, rear fuselage, active interceptor systems, targeting lasers and weapon release cables, mainly through BAE Systems."

BAE systems contract out much of its work on F-35s. It has more than 100 suppliers and numerous sub-tier suppliers across the UK. According to its website page on F-35, it supports jobs as a result of its suppliers list *"across every region of the UK."* The implication here is that it supports F-35-related contracts in Northern Ireland. In 2023, BAE Systems at Samlesbury Aerodrome in Lancashire made the rear fuselage - the section that extends from the main cabin area to the tail - for every F-35 and <u>made its 1,000th one for Lockheed Martin</u> in February 2023.

#### What Act Now asked in the FOI?

In July 2024, Act Now asked Invest NI for minutes or records of any meetings held with BAE systems or on the topic of BAE systems since Invest NI's inception. Much of the information remained disclosed due to FOI exemption rules.

In March 2025, Act Now asked Invest NI for records of references to the term "F-35" within notes of meetings logged on our CRM system within the last 20 years. Much of the information remained disclosed due to FOI exemption rules.

#### What did we get back?

Act Now received information showing that Invest NI has met with BAE systems 34 times between March 2003 to January 2020. We received meeting logs from the CRM in both FOI requests.

Many meetings mention the possibility of collaboration, Foreign Direct Investment and commercial opportunities. For example, in one meeting from 11/10/2012, Invest NI's objectives from the meeting were to *"understand BAE*'s plans [REDACTED]; understand structure and opportunities; Get referrals to the appropriate contacts from those divisions."

**Invest NI discussed F-35 contracts with BAE systems.** In the meeting notes from a meeting dated 28/06/2013, the objective was "to get on to the [BAE's] suppliers list." Although most of the meeting notes were redacted, F-35 is mentioned: "Any contracts they sign would be long term with projects such as the F-35 being for the next 25 years." It is unclear who they refer to here.

#### What did it reveal?

The information received shows that Invest NI was involved in conversations with BAE Systems about F-35 contracts and sought a deeper working relationship with them. Such a relationship would make sense for Invest NI as they would want local companies in NI to win contracts and get on BAE systems suppliers list. In particular, the aforementioned meetings, strongly signals the possibility that Invest NI have made attempts to find out more about how smaller companies can get on the suppliers list to make aspects of the components that BAE systems make for Lockheed Martin's F-35s.

In fact, as outlined in the section below on RLC(UK), Invest NI knew of RLC's involvement in a BAE systems' F-35 contract, as well as key and substantial administrative and strategic support to win contracts such as F-35s. Although we are unable to ascertain whether Invest NI provided key support to NI companies to win F-35 contracts specifically related to BAE Systems, there is a strong possibility that they did given that the UK supplies 15% of the value of the F-35 jet primarily through BAE Systems.

## **The Companies**

## RLC (UK) - Newtownabbey and Crumlin

#### **Background of the company**

According to research conducted by Campaign Against Arms Trade (CAAT), Crumlin and Newtownabbey based RLC (UK) Limited produces <u>"F-35 Joint Strike</u> <u>Fighter titanium fuselage components and titanium fan blades"</u>. In a Freedom of Information request made by Act Now in September 2024 and additional reporting from Garrett Hargan at the Belfast Telegraph, RLC Engineering Group LTD was given £9.73m over 21 years, placing it among the investment agency's top beneficiaries. In the latest RLC accounts, it says the company has "a prominent position on military aircraft, dominated by the F-35 Joint Strike Fighter titanium fuselage components and titanium fan blades". In its key business highlights, the company says that the <u>"demand for military components remains strong as we</u> <u>have a strong position on the F-35 Platform."</u>

#### What we asked in the FOI

In March 2025, Act Now asked Invest NI for records of meetings with RLC logged on their CRM system within the last 8 years, including information on the purpose of the meetings captured within the meeting notes field along with any associated meeting minutes from our EDRMS. Much of the information remained disclosed due to FOI exemption rules.

In the same FOI, we asked Invest NI for records of references to the term "F-35" within notes of meetings logged on their CRM system within the last 20 years. Much of the information remained undisclosed due to FOI exemption rules.

#### What did we get back?

**Since 2017, Invest NI has met with RLC 51 times.** As well as client meetings, Invest NI made multiple site visits to the RLC factories in Newtownabbey and Crumlin and were given a factory tour. Invest NI have also conducted specialised meetings such as on the topic of *"Precision Engineering Skills meeting."* Invest NI met at both sites to discuss R&D projects. The most recent meeting took place in April 2023.

A research collaboration exists with Queen's University Belfast and Moyola Precision Engineering that may benefit the company's capacity to produce components for F-35s. Invest NI also met with Queen's University Belfast and RLC on 12/04/2019 "to discuss outstanding issues on collaborative R&D projects." This might refer to Project SCENIC which is a collaboration and consortium of four Northern Ireland aerospace sector companies which includes RLC UK and Moyola Precision Engineering (read the DfE's press release from 2022). The project was set-up to "address the gap in titanium and hard metal machining by increasing Northern Ireland's capabilities to ensure lightweight technologies meet the increasing use of composite materials in the aerospace sector." As previously noted, RLC accounts suggest the company is involved with making the F-35 titanium fuselage components and titanium fan blades.

As part of the collaboration, QUB will build<u>a new £98million state-of-the art</u> <u>Advanced Manufacturing Innovation Centre at Global Point in Newtownabbey</u> where the RLC (UK)factory is based.

**Invest NI discussed and offered support to RLC to win F-35 contracts.** During Invest NI's client visit to RLC (UK) in 03/02/2010, a meeting was held to "discuss how best Invest NI can assist LLE team win a significant share of the F-35 contract."

**RLC may be involved with a BAE systems F-35 contract and updated Invest NI on the progress of the contract.** In a client meeting on 31/01/2019, the meeting notes state "meeting with [REDACTED] to update INI on developments and to gain understanding of future plans. Accounts are to be forwarded to INI later after Board meeting." Although nearly all of the meeting notes from there on in are redacted, the FOI revealed one note stating "BAE F35 contract going well [REDACTED]."

#### What did it reveal?

Not only has Invest NI provided financial assistance to RLC, but also key and substantial administrative and strategic support to win contracts such as F-35s. In so doing, Invest NI had significant access to RLC's present and future plans.

The research collaboration project with Queen's University Belfast, RLC and Moyola Precision Engineering may help to support RLC's capacity to produce F-35 components.

Invest NI knew of RLC's involvement in a BAE systems F-35 contract.

### Moyola Precision Engineering - Castledawson

#### Why the company?

Moyola Precision Engineering received £5.67m from Invest NI in the past 22 years, with some of that allocated in 2023/24. Its website states: "Moyola manufactures a wide range of components, for various defence applications. This includes airframe parts for F35, Gripen A400M and performance critical precision components for missiles, optical and sonar equipment and launch and guidance platforms."

#### What we asked in the FOI?

In March 2025, Act Now asked Invest NI for records of meetings with Moyola Precision Engineering logged on their CRM system within the last 8 years, including information on the purpose of the meetings captured within the meeting notes field along with any associated meeting minutes from their Electronic Document and Records Management System (EDRMS). Much of the information remained undisclosed due to FOI exemption rules.

In the same FOI, Act Now asked Invest NI for records of references to the term "F-35" within notes of meetings logged on their CRM system within the last 20 years. Much of the information remained undisclosed due to FOI exemption rules.

In December 2024, Act Now asked the Department for the Economy for the following information on Moyola Precision Engineering:

- Records/logs of the number of meetings the Minister for the Economy and the Department for the Economy has had with Moyola Precision Engineering over the past 22 years
- 2. Information on the purpose of those meetings
- 3. The minutes of any meetings held with Moyola Precision Engineering over the past 22 years

#### What did we get back?

Since 2017, Invest NI has met with Moyola 62 times. As well as client meetings, Invest NI made multiple site visits to the Moyola factory and were given a factory tour. Invest NI have also conducted specialised meetings such as on the topic of *"Precision Engineering Skills meeting."* Invest NI met at the site to discuss R&D projects and met as recently as January 2025.

Machinery mentioned in meeting notes is the type of machinery that is used for the F-35 programme. In the client visit to Moyola on 26/05/2017, Invest NI were given a tour of facilities where new machinery was discussed in the meeting notes: "New CNC machines now installed in extension and shopfloor was busy with good housekeeping evident. New CMM with higher accuracy operational and provides additional integrity to the Moyola offering." Computer numerical control (CNC) machines and coordinate measurement machines (CMM) are key processes in F-35 production and supply chains.

Moyola is an ITAR (International Traffic in Arms Regulation, US regulatory regime) compliant facility. From another FOI to the Department for the Economy, we discovered that Moyola site at Castledawson is an "ITAR (International Traffic in Arms Regulations, a US regulatory regime) compliant facility given its involvement in US defence related contracts." As a result, a site visit from the Minister at the time, Diane Dodds, and members from the department required them to bring photographic ID and photos on the shopfloor were limited.

<u>According to the U.S. State Department</u>, ITAR is the implementation of the U.S. government's export and temporary import of defense articles and services governed by 22 U.S.C. 2778 of the Arms Export Control Act (AECA).

<u>According to leading International Trade consultants clearBorder</u>, ITAR is "designed to control the export and import of defence-related articles and services listed on the USML (United States Munitions List). It serves as a safeguard to prevent the unauthorised transfer of sensitive military technologies, data, and services to foreign entities or individuals."

In other words, any weapon or component produced in an ITAR factory cannot be built, supplied or sold to anyone, or even operated, <u>without US consent and</u> <u>support.</u> F-35s are on the <u>United States Munitions List</u> and are therefore subject to ITAR. In fact, the global distribution of F-35 components is <u>controlled by the US</u> <u>Government led F-35 programme</u> as admitted by the UK government's Secretary of State for Defence.

Moyola is linked to a US federally funded research and development agency that has worked on F-35 contracts. In the following meeting notes on 06/11/2019, the subject is titled "ATI client visit" and in the meeting notes it states the following: "Meeting as part of visit to NI by two senior ATI officials, [REDACTED], Head of Technology, Structures, Manufacturing & Materials and [REDACTED] Technology, Manufacturing & Structures. The visit programme was organised by [REDACTED] and INI attendees [REDACTED] [REDACTED]. Opportunity to introduce company [Moyola] to ATI and discuss potential projects. ATI have a number of actions to follow up with company."

ATI likely refers to <u>Advanced Technologies International</u> which is a US federally-funded research and technology development agency that typically works for the Department for Defense, aiming "to lessen the burden on the *Government by coordinating and executing our nation's most innovative research initiatives.*" In 2014, Advanced Technologies International <u>won the 2014</u> <u>Defense Manufacturing Technology Achievement Award</u> for leading the F-35 Canopy Thermoforming Automation project: "The project, a joint effort between *ATI*, the Office of Naval Research, Naval Air Systems Command and GKN Advanced Transparency Systems, will save the F-35 Lightning II Program as much as \$125 million by automating the forming of advanced fighter canopies."

Invest NI prepared Moyola to pitch at the annual Aerospace & Defense Supplier Summit Seattle (ADSS). In meetings on 19/02/2018 and 20/02/2018, Moyola attended day 1 and 2 of the "*pitch Optimisation Programme in preparation for ADSS Seattle March 2018.*" The programme is delivered by Marcomm Training." The ADSS is <u>"a supply chain event that brings together</u> *aerospace and defense primes, tier suppliers and contract-manufacturers. Engineering, procurement, supply chain, fabrication, commodity teams, suppliers and service providers will meet through pre-arranged one-on-one meetings.*" BAE systems regularly attend this summit.

**Boeing visit programme meeting.** There is a meeting log on 09/05/2018 called Boeing visit programme that doesn't state where the meeting takes place, no meeting notes or meeting purpose. In November 2024, Israel signed a <u>\$5.2 billion</u> <u>deal to acquire 25 F-15 fighter jets from Boeing.</u> F-15s are also on the United States Munition List.

Moyola has CAD/CAM Engineers - services that are regularly used to manufacture F-35s. In a client meeting on 21/05/2018, the meeting notes state that "Moyola will allocate one CAD/CAM Engineering to project." According to this job description, CAD/CAM Engineer is responsible for reviewing customer supplied data and drawings, performing design rule checks and creation of manufacturing data, programs and tools required for the manufacture of PCB. CAD/CAM services are regularly used in the manufacturing of F-35s.

Moyola participated in an Northern Ireland Advanced Composites and Engineering Centre (NIACE) working group that comprised arms companies linked to the Israeli military. In a meeting on 13/02/19, the meeting notes state that "discussions on the importance of collaboration in NI Aerospace Sector with AGP Manufacturing Supply Chain Working Group at NIACE. The working group comprised of Leonardo, GKN and Safr[a]n." Leonardo S.p.A provides weapons and planes to the Israeli Ministry of Defense, the Israeli Air Force and the Israeli Navy. In December 2024, Leonardo won a <u>£26.6 million U.S. defense contract to supply</u> <u>Active Expendable Decoys (AEDs)</u> for the F-35 Lightning II. <u>Safran</u> has also supplied weapons and components to the Israeli military.

**Project SCENIC collaboration with RLC(UK), Queens University Belfast, Ulster University, NI Executive and UK government.** In 16/04/2019, Moyola met with the above about Project SCENIC (see section in "RLC (UK) for more information).

**Invest NI has worked closely with Moyola on their strategic and project plans.** These meetings took place 10/06/2021 and 06/10/2021. The former meeting notes state that Moyola "will continue to work closely with Invest NI as it develops its strategic plans for the future."

#### What did it reveal?

Our findings reveal that Moyola Precision Engineering has the factory capabilities and labour specialisations for key processes in F-35 production and supply chains.

Because Moyola Precision Engineering is an ITAR compliant facility, there is a strong possibility that the company might be exporting military goods to the United States. Their relationship with a US federally-funded research and technology development agency that works for the U.S. Department of Defense only adds to this possibility.

What's for sure is that whatever Moyola produces and exports within its factory can only do so with the consent of the U.S. government. Therefore, **as F-35s are subject to ITAR and Moyola produces airframe parts for F-35s, it can be inferred that there is a strong likelihood that the F-35 components produced by Moyola have been distributed to the US where the jets have been built and then supplied to Israel.** 

#### The Boeing Visit Programme raises questions on whether Moyola Precision Engineering also produces components for F-15s which are also being used by Israel.

Serious questions must be asked on whether the research collaboration project with Queen's University Belfast, Moyola Precision Engineering and RLC is assisting with Moyola's capacity to produce F-35 components.

Not only has Invest NI provided financial assistance to Moyola Precision Engineering, but also key and substantial administrative and strategic support, meeting as recently as January 2025. In doing so, Invest NI had significant access to Moyola's current and future plans.

## Survitec (Dunmurry)

#### Why the company?

According to research conducted by Campaign Against Arms Trade (CAAT), Dunmury based RFD Beaufort Limited (Survitec Group Limited) was named as one of the UK-based companies making components for F-35s, producing "<u>"industrial rubber goods, rubberized fabrics, and miscellaneous rubber</u> <u>specialties for marine and aviation safety and survival equipment</u>." Survitec received £4.26m from Invest NI and has a brochure saying <u>it produces flight</u> <u>equipment for F-35 pilots.</u>

#### What we asked in the FOI?

In March 2025, Act Now asked Invest NI for records of meetings with Survitec logged on their CRM system within the last 8 years, including information on the purpose of the meetings captured within the meeting notes field along with any associated meeting minutes from their Electronic Document and Records Management System (EDRMS). Much of the information remained undisclosed due to FOI exemption rules.

#### What did we get back?

Since 2017, Invest NI has met with Survitec 41 times. As well as client meetings, Invest NI made multiple site visits to Survitec's factory and were given factory tours.

#### What did it reveal?

Invest NI have also conducted specialised meetings such as on the topic of "R&D" and "growth" of business. Invest NI met at the site to discuss R&D projects. Survitec and Invest NI met as recently as January 2025.

## **Electronic Automation Engineers (Belfast)**

#### What we asked in the FOI?

In March 2025, we asked Invest NI for records of references to the term "F-35" within notes of meetings logged on their CRM system within the last 20 years. Much of the information remained undisclosed due to FOI exemption rules.

#### Why the company?

As <u>reported in the Belfast Telegraph</u> in May 2025, Act Now discovered a fourth company, Electronic Automation Engineers (EAE), that has worked on F-35 related contracts and received over £150,000 in public funds from Invest NI since 2018/29. The company is based in Belfast. According to its website, EAE "offer a specialised service, providing bespoke or predefined Automation system design and integration of Machinery / Manufacturing Systems."

The types of financial assistance provided by Invest NI includes: (1) Creating Jobs / Capital Investment / Business Development; (2) Investing in R&D and Innovation; (3) Developing Skills.

#### What did we get back?

Act Now received two meeting logs from 2018 where Invest NI and Electronic Automation Engineers discussed F-35s, BAE systems and Lockheed Martin.

EAE have most likely worked on F-35 contracts for Lockheed Martin and BAE systems. On 19/02/2018 and 14/05/2018, Invest NI conducted client meetings with EAE.

In the former, the meeting notes state a possible goal of the meeting "to discuss potential for EAE to become Invest NI client." Therein outlines that "EAE are automation specialists [REDACTED] [p]rovides manpower support for [REDACTED] **has worked on** [REDACTED] **and F35 for Lockheed Martin in the UK**."

In the latter meeting, the notes state a possible goal of the meeting "to discuss recent business plans and potential SFA support." Therein, EAE "**outlined that business remains extremely busy with a number of current projects being undertaken including** [REDACTED] **BAE Systems** [REDACTED] **for F35** [REDACTED]."

#### What did it reveal?

The meeting logs reveal the clearest link yet between Invest NI and the two main partners of the F-35 programme — BAE systems and Lockheed Martin.

Given that Invest NI knew NI-based Electronic Automation Engineering (EAE) had worked on F-35 projects for the aforementioned companies, **did Invest NI conduct due diligence and contact the company to assess whether they continue to provide services for F-35 projects once Israel's bombing campaign commenced?** 

As such, there is a strong possibility that taxpayer's money has provided specialised support for Israel's F-35 war planes.

# Other Notable Invest NI meetings in regards to F-35s or Israel

#### What we asked in the FOI?

In March 2025, Act Now asked Invest NI for records of references to the term "Israel" within notes of meetings logged on their CRM system within the last 20 years.

In March 2025, we asked Invest NI for records of references to the term "F-35" within notes of meetings logged on our CRM system within the last 20 years. Much of the information remained disclosed due to FOI exemption rules.

#### What did we get back?

**Invest NI met with the Department for Business and Trade Netherlands in July 2024 to discuss tender for F-35 parts.** Invest NI met with the Department for Business and Trade Netherlands on 31/07/2024. The subject of the meeting was stated as "Introduction and opportunities in the Netherlands in Defence and Security." The meeting notes state the following: "[REDATED] and I met to discuss a tender for F-35 parts in the Netherlands by the MOD there." According to Reuters, the Netherlands <u>"houses one of several regional warehouses of</u> <u>U.S.-owned F-35 parts which are then distributed to countries that request them,</u> <u>including Israel.</u>"

**Invest NI held a lunch for Israel's Minister for Trade & Economic Affairs in 2013.** In 30/04/2013, "[REDACTED] attended a lunch held in Invest NI for the Minister of Trade & Economic Affairs of Israel Noah Shani to discuss opportunities in Israel."

#### What did it reveal?

Why did Invest NI meet to discuss an F-35 tender based in the Netherlands six months after the International Court of Justice ruled that that Israel is plausibly committing genocide in Gaza? Given the significant administrative and strategic support the non-departmental public body has provided the aforementioned companies linked to the F-35 programme, there is a real chance that Invest NI was assessing the possibility of whether NI-based companies could meet the obligations of this tender. Also, given that the Netherlands houses several warehouses of US-owned F-35 parts and that Moyola Precision Engineering is subject to ITAR as discussed above, it raises the possibility that Moyola would be able to supply parts to such a warehouse.

## Conclusion

Our investigation reveals that Invest NI not only offered these four companies important financial support to help develop their factories, labour force and more; but also provided key administrative support to win contracts - including ones related to F-35s - and support with strategic plans.

From discussing F-35 contracts with BAE systems to seeking out tenders for F-35 parts abroad, the aforementioned meeting notes reveal that Invest NI had knowledge and actively sought out relationships within the F-35 programme. As a result, this raises questions over Invest NI statements that they have limited knowledge on what these companies produce and the countries they export to.

Furthermore, it exposes serious failings in Invest NI's due diligence process. Did Invest NI conduct due diligence and contact the four NI-based companies to assess whether they continue to provide services for F-35 projects once Israel's bombing campaign commenced?

We believe that Invest NI and its partnership agreement with the Department for the Economy is no longer fit for purpose. There is a complete lack of oversight from the DfE and the Economy Minister over the financial assistance Invest NI offers and the activities the public body pursues. The very fact that it was tens of hundreds of everyday people across NI outraged by Israel's genocide in Gaza who took action to reveal this funding and demand accountability from Invest NI - and not elected officials - demonstrates a serious failure of basic governance. We call for a fully independent investigation of Invest NI funding.

Finally, our report publication coincides with the recently announced legal challenge <u>over alleged state funding of Northern Ireland-based companies</u> <u>potentially linked to providing F-35 fighter jets to Israel that will be heard in the</u> <u>autumn.</u> Madden & Finucane have issued proceedings against the Department for the Economy (DfE) and Invest NI by a Belfast-based member of campaign group Cairde Palestine. It is our hope that this report supports this judicial review.